

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

**Daramic Inc.  
3430 Cline Road  
Corydon, IN 47112**

**ATTENTION:**

**Brian Thompson  
EHS Manager**

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring Daramic Inc. (Daramic or you) to submit certain information about the facility at 3430 Cline Road, Corydon, IN. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us as specified in each Appendix.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Daramic owns and operates an emission source at the Corydon, IN facility. We are requesting this information to determine whether your emission source is complying with the Clean Air Act.

Daramic must send all required information to:

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency

Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

Daramic must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

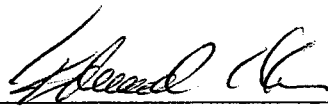
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Daramic to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Cindy Schafer at 312 353-3018.

5/18/16  
Date

  
\_\_\_\_\_  
Edward Nam  
Acting Director  
Air and Radiation Division

## **Appendix A**

When providing the information requested in Appendix B use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

#### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

## Appendix B

### Information You Are Required to Submit to EPA

Daramic must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) for the emission source at 3430 Cline Road NW, Corydon, IN (the Facility) according to the following schedule:

Items 1-5	Within 30 days of receiving this request.
Items 6-15	Within 60 days of receiving this request.

1. Provide a list of all maintenance activities, equipment upgrades, or modifications that took place on the oil extraction operations identified as Sub-Micro (SM) Line 3, SM Line 4, and SM Line 6 in Title V Permit No. 061-35655-00012 performed from March 1, 2011 to present. Include a description of the maintenance, upgrade, or modification performed; the cost of the maintenance, upgrade or modification; and date(s) the maintenance, upgrade, or modification was conducted. For any maintenance activities, equipment upgrades, or modifications to emission units and control devices performed after December 10, 2015 also indicate if the maintenance, upgrade or modification was performed based on findings from the December 10, 2015 EPA inspection.
2. For equipment upgrades and modifications identified in item 1 above, provide a description of the work performed in a Microsoft Excel or compatible spreadsheet format. This description should include but is not limited to the following:
  - a. The date completed or projected to be completed;
  - b. The project work order number;
  - c. The dollar amount approved and/or expended; and
  - d. The trichloroethylene (TCE) emissions increases or decreases as a result of the project.

Additional documents including but not limited to reports, emails, and work orders should be included for each equipment upgrade or modification identified in item 1 above. Each additional document should specify which capital project it is associated with.

3. Provide in Microsoft Excel or compatible spreadsheet format, actual trichloroethylene (TCE) emissions for the oil extraction operations identified as SM Line 3, SM Line 4 and SM Line 6 in Title V Permit No. 061-35655-00012 for 2011 through 2015. Include example calculations, emission factors, emission factor references, and explain the calculation method.
4. Provide in Microsoft Excel or compatible spreadsheet format, the daily production records for the oil extraction operations identified as SM Line 3, SM

Line 4 and SM Line 6 in Title V Permit No. 061-35655-00012 from March 1, 2011 to present. This should include but is not limited to the following:

- a. The start and end times for each day;
  - b. The mode of operation (ex. Normal operation, hot standby, off-line);
  - c. The number of operating hours each day for each mode of operation;
  - d. The battery separator production rate in square meters per day; and
  - e. The daily TCE addition for each of the oil extraction operations in pounds per day.
5. Provide the actual maximum production rate and the actual average production rate achieved in practice on an hourly, monthly and annual basis, in square meters, for the oil extraction operations identified as SM Line 3, SM Line 4 and SM Line 6 in Title V Permit No. 061-35655-00012 for past ten years.
  6. Provide an explanation for how and when TCE is added to each of the extraction lines. The description should include, at a minimum, whether TCE is added automatically or manually and whether the trigger to add TCE is automated or requires plant personnel to monitor TCE levels.
  7. Provide copies of permit applications submitted to the Indiana Department of Environmental Management (IDEM) from March 1, 2011 to present. Provide all emission calculations included with the permit applications in Microsoft Excel or compatible spreadsheet format.
  8. Provide copies of operation and maintenance manuals and preventative maintenance plans for each TCE extraction operation and the carbon adsorption system (CAS).
  9. Provide copies of Notification of Compliance Status Reports for the leak detection and repair program that were submitted to IDEM from January 2011 to present.
  10. Provide in Microsoft Excel or compatible spreadsheet format, from the date of installation of the continuous emissions monitors (CEMS) on the inlet and outlet of the CAS to present, daily TCE emissions data exhausted to the CAS and daily control efficiency averages for the CAS. Indicate the date the CEMS was installed.
  11. For the TCE monitors located in the room with the oil extraction operations identified as SM Line 3 and SM Line 4 in Title V Permit No. 061-35655-00012, provide the following information:
    - a. Provide a diagram showing the location of each TCE monitor in the diagram. Include the dimensions of the room, the distance of the monitors from any walls, ceiling, floor and process equipment, the locations of the oil extraction operations SM Line 3 and SM Line 4, and the locations of

- all exits and openings to either the atmosphere or other interior building areas. The diagram should include the identification of all emission units and unique identifiers for each monitor;
- b. Installation date of each monitor;
  - c. Description of each monitor including the manufacturer and model number;
  - d. All records of readings from the monitors from March 1, 2011 to present. If no readings are present, install a data logger within 60 days of receiving this request and begin recording TCE monitor concentration readings 4 or more times per hour except during periods of calibration, quality assurance, or maintenance activities are being performed. During these periods, a valid hourly average shall consist of at least 2 data points with each representing a 15-minute period. The data logger must be able to record the TCE concentration readings from each monitor, in parts per million, at least once every 15 minutes for a period of at least a year. Reduce the data from the data loggers to 1-hour averages computed from 4 or more data points equally spaced over each 1-hour period, except during periods of calibration quality assurance or maintenance activities when only 2 data points are required.
  - e. Provide the calibration frequency, a list of all calibration gases, the expiration date for each calibration gas, and calibration procedures used to calibrate the monitors.
  - f. Provide an explanation of all data validation procedures conducted.
  - g. Following the first month in which the data logger is installed, provide the hourly TCE concentration averages collected by the data logger by the 15<sup>th</sup> day of the month for the previous month for a period of 24 months.
12. For the building vent(s) that exhausts air from the room where the oil extraction operations identified as SM Line 3 and SM Line 4 in Title V Permit No. 061-35655-00012 are located, provide the airflow rate through the vent(s).
  13. Provide all the information used to determine the annual uncaptured TCE emission rate in the handout provided to U.S. EPA inspectors during the December 10, 2015 inspection. Include assumptions, equations, example calculations and the proportion of emissions that are attributable to each extraction line.
  14. For the modeling conducted by Daramic and submitted to IDEM on October, 2015, provide the information used to determine emissions of 33.87 tons per year for S34VENTA and 75.40 tons per year for S34VENTAB sources. Provide any supporting calculations in Microsoft Excel or compatible spreadsheet format. Include assumptions, equations and example calculations.



Year	Fugitive Emissions (TPY)	Non-fugitive Emissions (TPY)	Total (TPY)	Op Days
2011	160.12	25.43	185.55	355
2012	122.13	20.60	142.73	318
2013	105.68	17.63	123.31	282
2014	169.43	12.18	181.61	260
2015*	173.23	7.77	181.00	243

\*Numbers as of 12/5/15; 2015 Fugitive and Non-fugitive Emissions are estimates (on high side) which include TCE that exits the plant via wastewater discharge and in waste

14. For the modeling conducted by Daramic and submitted to IDEM on October, 2015, provide the information used to determine emissions of 33.87 tons per year for S34VENTA and 75.40 tons per year for S34VENTAB sources. Provide any supporting calculations in Microsoft Excel or compatible spreadsheet format. Include assumptions, equations and example calculations.

## **Appendix C**

### **Confidential Business and Personal Privacy Information**

#### **Assertion Requirements**

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

### **Determining Whether the Information is Entitled to Confidential Treatment**

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

#### **Personal Privacy Information**

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

**CERTIFICATE OF MAILING**

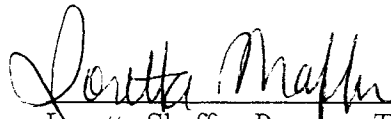
I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the  
Clean Air Act by Certified Mail, Return Receipt Requested, to:

Brian Thompson, EHS Manager  
Daramic, LLC  
3430 Cline Road NW  
Corydon, IN 47112

I also certify that I sent a copy of the Request to Provide Information Pursuant to the  
Clean Air Act by First-Class Mail to:

Phil Perry, Chief  
Division of Air Pollution Control  
100 North Senate Avenue  
Indianapolis, IN 46204

On the 18 day of May 2016.

  
Loretta Shaffer, Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7673 8446